## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOSEPH LINDQUIST, on behalf of himself and all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

LILLIAN MARDIKIAN, on behalf of herself and all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

ERNESTO MEDINA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

Case No. 2:23-cv-01236-KNS

**CLASS ACTION** 

JURY TRIAL DEMANDED

Case No. 2:23-cv-01246-KNS

**CLASS ACTION** 

JURY TRIAL DEMANDED

Case No. 2:23-cv-01270-KNS

**CLASS ACTION** 

JURY TRIAL DEMANDED

CHRISTINE NEUBAUER, individually and on behalf of all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

JUDE PALMER, individually and on behalf of all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC. and BANK OF AMERICA CORPORATION,

Defendants.

HOWARD SUH, individually and on behalf all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC.,

Defendant.

Case No. 2:23-cv-01300-KNS

**CLASS ACTION** 

JURY TRIAL DEMANDED

Case No. 2:23-cv-01315-KNS

**CLASS ACTION** 

JURY TRIAL DEMANDED

Case No. 2:23-cv-01338-KNS

**CLASS ACTION** 

JURY TRIAL DEMANDED

KYLIE MEYER, individually and on behalf of all others similarly situated,

Plaintiff,

v.

NCB MANAGEMENT SERVICES, INC. and BANK OF AMERICA CORPORATION,

Defendants.

Case No. 2:23-cv-01340-KNS

**CLASS ACTION** 

JURY TRIAL DEMANDED

# NCB MANAGEMENT SERVICES, INC.'S RESPONSE TO PLAINTIFFS' MOTION TO CONSOLIDATE ACTIONS AND SET RELATED DEADLINE AND TO APPOINT INTERIM CO-LEAD CLASS COUNSEL, PLAINTIFFS' LIAISON COUNSEL, AND PLAINTIFFS' STEERING COMMITTEE

Defendant, NCB Management Services, Inc. ("NCB"), hereby responds to Plaintiffs' Motion and joins in the Response previously filed by Defendant, Bank of America Corporation.

NCB incorporates Bank of America's arguments and position regarding the Plaintiffs' Motion as if set forth herein in this response.

Respectfully submitted,

#### MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN

By: /s/ David J. Shannon

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Date: April 26, 2023

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's Response to Plaintiffs'

Motion to Consolidate Actions and Set Related Deadline and to Appoint Interim Co-Lead Class

Counsel, Plaintiffs' Liaison Counsel and Plaintiffs' Steering Committee was served this date, via
the court's electronic filing system, to all counsel of record.

### MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN

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Date: April 26, 2023

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